

## Wilder, Ceciley

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**From:** Balaji Vaidyanathan <Vaidyanathan.Balaji@azdeq.gov>  
**Sent:** Thursday, January 28, 2016 3:33 PM  
**To:** Rios, Gerardo  
**Cc:** Brian Parkey; Chen, Eugene  
**Subject:** Title I modifications  
**Attachments:** 1995 8 31 proposed package.pdf; 2000 11 29 Email Scott Miller Title I Modification Interpretation.pdf

Hi Gerardo. Thanks for taking the time to talk with me on the Freeport Morenci minor revision issue. We look forward to hearing from you on whether we can proceed to issuance.

As we discussed, I am forwarding a couple of documents on the broader issue that we discussed. The attached e-mail from the Region 4 EPA staffer supports our general position on the issue. Title I modifications refer to modifications under the NSR/PSD and NSPS programs. Our position is that any construction or reconstruction with NSPS implications is not a Title I modification and consequently, such projects may be authorized as minor revisions to the extent that all applicable gatekeepers for a minor permit revision are met.

Please let me know if you have questions or if we need additional discussions.

Regards,  
Balaji

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